



## Elk Hills Power conference call

Mon 03/19/2012 9:00 AM - 10:00 AM

Attendance is **required** for Michele Dermer

Chair: **Sonnie\_Pineda@oxy.com**

Sent By: **<Sonnie\_Pineda@oxy.com>**

Location: Conference Call *→ Bakersfield.*

*Jay Pruitt*

Required: aburzlauff@mhausa.com, Michele Dermer/R9/USEPA/US  
Time zones: This entry was created in a different time zone. The time in that time zone is: Mon 03/19/2012 11:00 AM CDT - 12:00 PM CDT

### Description

When: Monday, March 19, 2012 9:00 AM-10:00 AM (UTC-08:00) Pacific Time (US & Canada).  
Where: Conference Call

Note: The GMT offset above does not reflect daylight saving time adjustments.

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### Ex. 6 - Personal Privacy

Would like to discuss this new information request.

#### Enclosure

1. Summary Section, Page 4, Formation Testing Program – The write up describes the September and October 2010 Fall off Tests (FOTs), however there was also a test conducted in December 2011. This section should be updated to include the most recent testing results.
2. Summary Section, Page 5, Plugging and Abandonment (P&A) Program and Results – The procedure outlined in Attachment Q should be tailored to the P & A of the currently operating wells, not be a presentation of the plan that was used to abandon well 25-18G.
3. Summary Section, Wells within the Area of Review, Pages 9 and 10 – The narrative description of the wells and the labels on the revised figure (Exhibit B-3) are inconsistent. For example, the narrative describes well 45WS-18G as a "Dry Hole"; however it is shown as "plugged" on the figure. Please correct either the narrative or the Figure.
4. Attachment D – please provide the written documentation regarding the aquifer exemption for the Tulare Formation. Refer to comment 10, below.
4. Attachment F, Lithology of the Confining Interval and Lithology of the Injection Interval – The information presented in the application re-packages a portion of the information included in the 1999 application. The lithology of these formations should be updated based on the information collected from drilling the four injection wells at the facility. Permeability or other characteristics should not be estimated when there is actual data that may be presented.
5. Attachment I, Page 30, 31 – Update the tables to include the results of the December 2011 FOT.
6. Attachment I, Page 32, 4th paragraph, 4th sentence, minor comment – The table of the average surface pressures is on page 26, not page 23.
7. Attachment I, Page 33, Well 35-18G- this section states that well 35-18G "has been retired from general use as an injection well". Please clarify, as this application includes this well as part of the renewal application.
8. Attachment Q - Plugging and Abandonment Plan – The information provided is insufficient. The plan should address the plugging and abandonment of the three injection wells including

EPA Form 7520-14, and a detailed third party cost estimate.

9. Attachment R, Necessary Resources – The financial statement will be required to demonstrate resources sufficient to plug and abandon the three permitted wells by a third party. The financial assurance amount has not changed since the permit was issued, and must be updated to reflect current estimated costs that will be revised per Comment #8 above.

10. Attachment 5, Aquifer Exemptions – this section should include the documentation of the aquifer exemptions granted.

Personal Notes